## IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:

ROBERT A. WHITE and
JOANNA A. WHITE,

Debtors,

REGIONAL ACCEPTANCE
CORPORATION,

Movant,

V.

ROBERT A. WHITE,
JOANNA A. WHITE and
RONDA J. WINNECOUR, Trustee,

## APPLICATION FOR ORDER DIRECTING PAYMENT OF FUNDS TO CREDITOR/CLAIMANT PURSUANT TO 11 U.S.C. SECTION 347 AND 28 U.S.C. SECTIONS 2041 ET.SEQ.

Respondents.

AND NOW, comes Movant, Regional Acceptance Corporation, ("RAC") by and through its undersigned counsel, Bernstein Law Firm, P.C., and in support of its Application for Order Directing Payment of Funds to Creditor/Claimant Pursuant to 11 U.S.C. Section 347 and 28 U.S.C. Sections 2041 Et. Seq. (the "Motion"), represents as follows:

- 1. On or about May 22, 2006, Debtors filed a voluntary petition for relief pursuant to Chapter 13 of the Bankruptcy Code. 11 U.S.C. § 101, et seq.
- 2. RAC timely filed a Proof of Claim in the amount of \$20,522.38, in the Debtors' bankruptcy on September 5, 2006 at claim no. 8.

3. On or about November 16, 2010, the Chapter 13 Trustee paid into the court the

sum of \$6,351.86, representing unclaimed funds owned by RAC. 11 U.S.C. § 347. A true and

correct copy of the report of unclaimed funds is attached hereto as Exhibit A.

4. Movant is entitled to payment of the unclaimed funds pursuant to 11 U.S.C. § 347

and 28, U.S.C §§ 2041 and 2042.

WHEREFORE, Regional Acceptance Corporation, respectfully requests this Honorable

Court enter an Order, pursuant to 28, U.S.C §§ 2041 and 2042, directing the Clerk of the U.S.

Bankruptcy Court to pay the sum of \$6,351.86 to Regional Acceptance Corporation from the

Unclaimed Funds in the above referenced case.

Respectfully submitted,

BERNSTEIN LAW FIRM, P.C.

By: /s/ Peter J. Ashcroft

Peter J. Ashcroft, Esq.

PA I.D. #87317

Suite 2200, Gulf Tower

Pittsburgh, PA 15219

(412) 456-8107

Fax: (412) 456-8255

Counsel for Regional Acceptance Corp.

Dated: April 13, 2011